

indicates a conveyance from Pitts to Shiply, conveying, inter alia Lots 19, 20, 86 and 87. Exhibit 8, the outconveyance from Shiply to one Grace Plummer, et al, conveys Lots 18, 19, 86 and 87, Exhibit 9 is a further inconveyance to Grace Plummer, et al, of Lots 19 and 20. However, Grace Plummer's outconveyances, Exhibit 7, refer to Lots 18 and 19. Examination of the plat shows these four parcels to be a block, that is Lots 19 and 20 are front lots to Lots 86 and 87. Examination of the chain of title back for Pitt also discloses Lot 19, 20, 86 and 87 being conveyed from Nicklas Hale to George Smith in 1793. Nicklas Hale drafted the plat of New Market (Exhibit 2) and title examination shows he was responsible for the town subdivision in 1793.

Exhibit 7 also sheds some light on where the title discrepancy grew up. That deed is an outconveyance from Grace Plummer, et al, and makes reference to perfection of her title (apparently a unification of the ground rent and the fee).

In further explanation of the title posture of the case, counsel would adopt the Bill of Complaint by reference, it containing a fuller explanation of the title search, and would move the admission of the Exhibits referred to therein (Exhibits 1 through 10).

Counsel submits a diligent search of land records discloses an apparent clerical error in conveyances in decedent's chain of title with misnumbering of Lots 19 and 20; shown as Lots 18 and 19 on all deeds in the chain of title from Plummer on.

No conveyance of Lot 20 has been located except as alleged.

Tax records and tax map show no owner listed for Lot 20.

Unable to locate any more current reference to potential interested persons. Examination of will records, tax records, land records, discussion with officials of Town of New Market have provided no further information regarding any potential persons interest in this lot.